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BACKGROUND:

<<Insert company name>> work-finding services to its clients. The Company must process personal data [(including sensitive personal data)] so that it can provide these services. In so doing, the Company acts as a data controller.

recruitment business which provides work-finding services to its clients. The Company must process personal data [(including sensitive personal data)] so that it can provide these services. In so doing, the Company acts as a data controller.

You may give your personal data to the Company directly, such as on an application or registration form, or we may collect them from another source, such as a third party. The Company must have a legal basis for processing your personal data. For more details, see our Privacy Policy. We will only use your personal data in accordance with the Privacy Policy. We will only use your personal data for the purposes of providing you with work-finding services.

You may give your personal data to the Company directly, such as on an application or registration form, or we may collect them from another source, such as a third party. The Company must have a legal basis for processing your personal data. For more details, see our Privacy Policy. We will only use your personal data in accordance with the Privacy Policy. We will only use your personal data for the purposes of providing you with work-finding services.

1. Information About Us

<<insert company name>>

A limited company registered in England with company number <<insert company number>>.

A limited company registered in England with company number <<insert company number>>.

Registered address: <<insert address>>

Main trading address: <<insert address>>

VAT number: <<insert VAT number>>

[Data Protection Officer: <<insert name>>]

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>

Postal address: <<insert postal address>>

[Representative: <<insert name>>]

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>

Postal address: <<insert postal address>>

[We are regulated by <<insert regulator name>>.]

[We are regulated by <<insert regulator name>>.]

[We are a member of <<insert association name>>.]

[We are a member of <<insert association name>>.]

[<<insert further information>>.]

2. What Does This Notice Cover?

This Privacy Notice explains what personal data we collect, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

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3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as information relating to an identifiable person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or other information specific to that person.

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be directly or indirectly identified.

Personal data is, in simple terms, any information that can identify you. Personal data can be directly identified, such as your name and contact details, but it also covers information that can identify you indirectly, such as identification numbers, electronic location data, and other information.

The personal data that we hold about you is described below.

4. What Are My Rights?

Under the Data Protection Act 2018, you have the following rights, which we will always work to uphold:

- a) The right to be informed. We will provide you with this Privacy Notice to tell you about how we use your personal data. You can always contact us to find out more about the details in Part 11.
- b) The right to access your personal data. We will tell you what we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data corrected if any of your personal data held by us is inaccurate or out of date. You can contact us using the details in Part 11 to find out more.
- d) The right to be forgotten. You can ask us to delete or otherwise dispose of any of your personal data. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict our use of your personal data.
- f) The right to object to our use of your personal data for a particular purpose or purposes.
- g) The right to withdraw your consent. If you have given us consent as the legal basis for our use of your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. You can ask us for a copy of the personal data that you have provided to us directly, where you have provided that data to us in a structured, commonly used and machine-readable format, and that the processing is based on your consent or for the performance of a contract, and that the data is held by us for the same purpose. This right applies in many cases.
- i) Rights relating to automated decision-making and profiling. [We do not use automated decision-making or profiling. [We do not use automated decision-making or profiling.]]

For more information about your rights as outlined above, please contact us using the details in Part 11.

It is important that your personal data we hold about you is accurate and up-to-date. If any of the personal data we hold about you is incorrect, please keep us informed as long as we have that data.

Further information about your rights can be obtained from the Information Commissioner's Office or your local Data Protection Officer.

If you have any cause for concern about the way we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would

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reference to an identifier'.

information about you that enables you to be identified, such as your name and contact details, or information such as identification numbers, electronic location data, and other information.

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- a) The right to be informed. We will provide you with this Privacy Notice to tell you about how we use your personal data. You can always contact us to find out more about the details in Part 11.
- b) The right to access your personal data. We will tell you what we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data corrected if any of your personal data held by us is inaccurate or out of date. You can contact us using the details in Part 11 to find out more.
- d) The right to be forgotten. You can ask us to delete or otherwise dispose of any of your personal data. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict our use of your personal data.
- f) The right to object to our use of your personal data for a particular purpose or purposes.
- g) The right to withdraw your consent. If we are relying on your consent as the legal basis for our use of your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. You can ask us for a copy of the personal data that you have provided to us directly, where you have provided that data to us in a structured, commonly used and machine-readable format, and that the processing is based on your consent or for the performance of a contract, and that the data is held by us for the same purpose. This right applies in many cases.
- i) Rights relating to automated decision-making and profiling. [We do not use automated decision-making or profiling. [We do not use automated decision-making or profiling.]]

personal data or exercising your rights as outlined above, please contact us using the details in Part 11.

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can be obtained from the Information Commissioner's Office or your local Data Protection Officer.

If you have any cause for concern about the way we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would

welcome the opportunity to contact us first, using the details

ourselves, however, so please

5. **What Personal Data Do You Provide?**

The Company may collect the following personal data [and special category or 'sensitive']

of the following personal data [and special category or 'sensitive']

Data Collected	How We Collect the Data
[Identity information including <<insert data collected, e.g. name, title, date of birth, gender>>.]	Method of collection and/or
[Contact information including <<insert data collected, e.g. address, email address, telephone number>>.]	Method of collection and/or
[Work information including <<insert data collected, e.g. CV>>.]	Method of collection and/or
[Other identity information including <<insert data collected, e.g. National Insurance number, nationality (for evidence of work)>>.]	Method of collection and/or
[Sensitive personal information including <<insert data collected, e.g. health information>>.]	Method of collection and/or
[<<add further information as required>>.]	

You are under no obligation to provide certain information

with data. However, if you do not provide work-finding services.

6. **How Do You Use My Personal Data?**

The Company needs to collect personal data in order to offer work-finding services to you.

ta in order to offer work-finding services to you.

The Company will process your personal data for the purposes of providing you with work-finding services. This includes, for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for roles, [arranging payments to you,] and developing and managing our relationship with you and our clients.

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In some cases, the Company may collect and process your data for the purpose of investigating, reporting and complying with laws that apply to us. We may also conduct internal audits to demonstrate our compliance with industry standards.

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[We use the following automated decision-making] AND/OR [profiling] on the basis of this or wish to opt out of the action themselves, rather than the automated method, the Data Protection Legislation gives you the right to. Please contact us to find out more

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using the details in Part 11.

- [The following automated method(s) may be used:
 - <<insert simple automated decision-making including the legal basis on which that data, and its intended effects>>.
 - <<add further details>>.]
- [The following automated method(s) may be used:
 - <<insert simple automated decision-making including the legal basis on which you rely on that data, and the intended effects>>.
 - <<add further details>>.]

method(s) may be used:
automated decision-making including the legal basis on which that data, and its intended effects>>.

place:
including the legal basis on which you rely on that data, and the intended effects>>.]

The legal bases we rely upon are:

- Your consent (e.g. to contact you as a new candidate or to manage our relationship with you);
- Where we have a legitimate interest in managing our database and keeping our work records up to date for providing services to you and our clients, where it is needed);
- To comply with a legal requirement (e.g. to check your entitlement to benefits or to comply with safeguarding requirements]).

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new candidate or to manage our relationship with you);
managing our database and keeping our work records up to date for providing services to you and our clients, where it is needed);
e subject to (e.g. in order to check your entitlement to benefits or to comply with safeguarding requirements]).

The Company will only use your personal data for the purposes for which it was originally collected, unless we believe that another purpose is compatible with those original purposes. If we do use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis for this.

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In some circumstances, we may process your personal data without your consent, where this is required by law. This will only be done within the bounds of the Data Protection Act 2018 and your legal rights.

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7. How Long Will You Keep Your Personal Data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collect it.

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Different laws may also require us to keep your personal data for different periods of time.

different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003 require us to keep work records for at least one year from:

Employment Businesses Regulations 2003 require us to keep work records for at least one year from:

- the date of their creation;
- after the date on which you cease to be employed with work-finding services.

with work-finding services.

[The Company must also keep your personal data for work records, holiday pay, sick pay, and pensions auto-enrolment records for as long as is legally required by HMRC and associated legislation].

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Where the Company has sensitive data, we will do so for a limited period to which you have consented. Where consent is not granted, we will delete the data.

to process your personal and data protection Policy. Upon expiry of the period, we will seek further consent from you. We will not process your data.

8. **How and Where Do You Store Personal Data?**

Personal Data?

Data is stored in a range of systems including the Company's candidate database, the Company's email systems and other IT systems (including cloud storage).

including on your application record, [in our candidate database] and in other IT systems (including cloud storage).

[We will [only store or transfer some of your personal data] within the UK and/or to equivalent standards.]

OR [store or transfer some of your personal data] within the EEA and/or to equivalent standards. All data will be fully protected under the Data Protection Legislation.]

AND/OR

[We will [only store or transfer some of your personal data] within the EEA (the "EEA") consisting of all EU member states, plus Iceland, Norway and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards.]

OR [store or transfer some of your personal data] within the EEA (the "EEA"). The EEA consists of all EU member states, plus Iceland, Norway and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards.]

AND/OR

[We [may] store or transfer some of your personal data in countries that are not part of the [European Economic Area] (the "EEA") which consists of all EU member states, plus Norway, Iceland, and Liechtenstein. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that your personal data is transferred to countries that do not have data protection laws that are as strong as those in the UK and under the Data Protection Legislation.]

personal data in countries that are not part of the [European Economic Area] (the "EEA") which consists of all EU member states, plus Norway, Iceland, and Liechtenstein. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that your personal data is transferred to countries that do not have data protection laws that are as strong as those in the UK and under the Data Protection Legislation. We take additional steps in order to ensure that your personal data is transferred securely as it would be within the EEA. These steps are as follows:

[We share your data with third parties within the EEA, where this involves the transfer of your personal data is protected under the same rules with respect to data protection as apply to our corporate rules". More information is available from the [European Commission](#).]

of which we are a part. Where we transfer your personal data to third parties within the group to follow the corporate rules. These are known as "binding corporate rules" and more information is available from the [European Commission](#).

AND/OR

[We share your data with third parties based outside of the EEA, where this involves the transfer of your personal data to countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the [European Commission](#).]

detailed below in Part 9, that are approved by the European Commission and [is] OR [are] applied to such data.

[We will only transfer your personal data to countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the [European Commission](#).]

and countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the [European Commission](#).

AND/OR

[We use specific contractual arrangements approved by the European Commission for the transfer of your personal data to third countries. These arrangements are approved by the European Commission and are applied to such data.]

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contracts require the same protection as the Data Protection Legislation. This protection is available from the [European Commission](#).]

protection that would apply under the Data Protection Legislation is available from the [European Commission](#).]

AND/OR

[Where we transfer your personal data to a third party, the data may be protected if they are part of a company that provides data protection to those in Europe. More information is available from the [European Commission](#).]

used in the US, the data may be protected if they are part of a company that provides data protection to those in Europe. More information is available from the [European Commission](#).]

Please contact us using the contact details below for the particular data protection requirements when transferring your personal data to a third country.]

1 for further information about the requirements when transferring your personal data to a third country.]

The security of your personal data is important to us, and to protect your data, we take a number of important measures, including:

, and to protect your data, we take a number of important measures, including:

- limiting access to your personal data to those employees, contractors, and other third parties who have a legitimate need to know and who are bound by confidentiality;
- procedures for dealing with any suspected or actual breaches (the accidental or unlawful disclosure of, or access to, your personal data) including reporting any such breaches to the Information Commissioner's Office where we are registered;
- <<describe specific measures>>

- limiting access to your personal data to those employees [, agents, contractors, and other third parties] who have a legitimate need to know and who are bound by confidentiality;
- procedures for dealing with any suspected or actual breaches (the accidental or unlawful disclosure of, or access to, your personal data) including reporting any such breaches to the Information Commissioner's Office where we are registered;

9. Do You Share My Personal Data?

The Company will process your personal data with the following recipients:

or sensitive personal data with the following recipients:

- HMRC;
- Clients of the Company;
- Any applicable legal advisers;
- Previous employers (where necessary for the purposes of any legal proceedings);
- [Payroll service providers];
- [<<Add additional recipients as appropriate>>].

- HMRC;
- Clients of the Company;
- Any applicable legal advisers;
- Previous employers (where necessary for the purposes of any legal proceedings);
- [Payroll service providers];
- [<<Add additional recipients as appropriate>>].

When your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights and the third party's obligations under applicable law, as described above.

When your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights and the third party's obligations under applicable law, as described above.

[If any personal data is transferred to a third party outside the EEA, we will take suitable steps in order to ensure that your personal data is handled just as safely and securely as it would be within the UK and in accordance with the Data Protection Legislation, as explained above in Part 8.]

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10. How Can I Access My Personal Data?

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it.

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it.

All subject access requests should be made in writing and sent to the email or postal address below.

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addresses shown in Part 1 of the Subject Access Request Form is a good starting point, but it is the easiest way to ensure your request is processed as quickly as possible.

There is not normally any charge for a subject access request. If your request is deemed to be 'manifestly unfounded or excessive' a fee may be charged to cover the costs of responding.

We will respond to your subject access request within [insert period (less than one month)] and, in any case, we will aim to provide a complete copy of your personal data within that time. In some cases, however, more time may be required up to a maximum of [insert period] from the date we receive your request. You will be kept informed of progress.

11. How Do I Contact You?

To contact us about any aspect of our personal data and data protection, including to make a subject access request, please use the following details [(for the attention of <<insert name>>)].

Email address: <<insert email address>>

Telephone number: <<insert telephone number>>

Postal Address: <<insert postal address>>

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes or our business in a way that affects personal data protection.

Any changes will be made available on our website [insert website address/where/how]. This Privacy Notice was last updated on <<insert date>>.

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